

MEMO ENDORSED

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November 14, 2019

*Via ECF*

The Honorable Ronnie Abrams  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

USDC-SDNY  
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Re: United States v. Joseph Meli, et al., 19 Cr. 480 (RA)

Dear Judge Abrams:

We represent Joseph Meli in the above-referenced matter. We write, with the consent of the government and counsel for defendant James Siniscalchi, to respectfully request an adjournment of the January 21, 2020 trial in this matter.

You may recall that in Mr. de Castro's first appearance in this matter on August 2, 2019, the parties and the Court discussed adjourning the trial to a date in February when the Court was potentially available due to Mr. de Castro's already secured travel plans for the Lunar New Year in the last week of January 2020. The parties agreed to speak with the other defense counsel in the case to confirm that a February trial date was acceptable to them. All counsel have conferred and support a trial adjournment.

Following the conference, we obtained the discovery, have met with our client, conferred with defense counsel, and conferred with the government. The discovery is voluminous and the additional time is necessary to permit the undersigned sufficient time to review it and review it with our client who is incarcerated.

Last week, Ms. Gotlib and Assistant U.S. Attorney Sarah Mortazavi spoke with Your Honor's deputy, Allison Cavale, regarding the Court's schedule. We proposed two dates to Ms. Cavale, February 18, 2020 and April 20, 2020. Ms. Cavale advised us that the Court is currently scheduled to be on trial during both of those dates and asked that we put our request, including the information about our conversation, in a letter to the Court.

Accordingly, we respectfully request that Your Honor adjourn the trial to a date that is amenable to the Court and that the Court adjourn the motion and pretrial submissions schedules accordingly. We apologize for any inconvenience and thank you for your continued attention to this matter.

Respectfully submitted,

/s/

César de Castro  
Valerie A. Gotlib

Cc: All counsel of record (*via* ECF)

Application granted. The trial is adjourned to April 20, 2020.

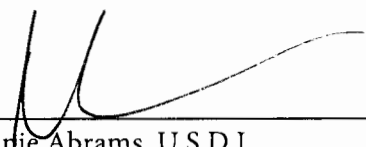
The defendants motions shall be filed by February 28, 2020, the Government shall respond by March 13, 2020 and any replies shall be filed by March 20, 2020.

Pretrial submissions shall be filed by March 20, 2020 and any responses shall be filed by April 3, 2020.

A final pretrial conference is scheduled for April 17, 2020 at 2:00 p.m.

Time is excluded to April 20, 2020 under the Speedy Trial Act, pursuant to 18 U.S.C. Section 3161 (h)(7)(A).

SO ORDERED.

  
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Ronnie Abrams, U.S.D.J.  
November 18, 2019